# 4.0 AIR QUALITY MODELING

Air dispersion modeling was conducted to assess the NO<sub>2</sub> and PM<sub>10</sub> PSD increment consumption in HA83, and the SO<sub>2</sub> PSD increment consumption in HA76, HA83, and HA85. The modeling study also identified portions of the planning areas where the PSD increment has been expanded since the baseline dates. The following sections discuss the model selection, model setup, and model application.

### 4.1 MODEL SELECTION

Several options were considered for the appropriate dispersion model for this analysis. Because there are significant terrain features in the HAs, particularly through the Truckee River Corridor, a model suited for addressing complex terrain issues was essential. The Industrial Source Complex Model (ISC3) was eliminated from consideration because it is not able to address complex terrain as well as other models considered. The enhanced Complex Terrain Dispersion Model (CTDMPLUS) has been used for complex terrain modeling in the region, but is cumbersome to run and must be used in conjunction with another model for simple terrain applications. After considering several options, a next-generation dispersion model called the AERMOD was selected for this PSD increment consumption modeling analysis. AERMOD combines the ability to address both complex terrain and simple terrain issues, and has improved dispersion algorithms for addressing boundary-layer meteorology. It is currently in the process of official EPA approval for regulatory analysis, and is now being used in several states for compliance modeling.

AERMOD is a Gaussian plume dispersion model that is based on planetary boundary layer principles for characterizing atmospheric stability. The model evaluates the non-Gaussian vertical behavior of plumes during convective conditions with the probability density function and the superposition of several Gaussian plumes (Federal Register 2000). AERMOD is a modeling system with three components; AERMAP is the terrain preprocessor program, AERMET is the meteorological data preprocessor, and AERMOD includes the dispersion modeling algorithms.

AERMOD was developed to handle simple and complex terrain issues using improved algorithms. As with CTDMPLUS, AERMOD uses the dividing streamline concept to address plume interactions with elevated terrain. However, AERMOD is less cumbersome to use than CTDMPLUS.

On April 21, 2000 the EPA proposed revising the *Guideline On Air Quality Models* (40 CFR, Part 51, Appendix W) to replace the ISC3 model with AERMOD as the preferred model for many air quality impact assessments including complex terrain applications. EPA's proposal came after the results of model evaluation studies indicated that AERMOD performs better than ISC3, and also as well or better than CTDMPLUS in complex terrain applications. AERMOD will replace ISC3 as the preferred state-of-

the-practice dispersion model for evaluating potential impacts from industrial sources within a 50 km radius of the source.

After concluding that AERMOD was the model best suited for use in this PSD increment consumption study, BAPC and BAQP sought approval for its use from EPA Region 9. After reviewing the goals of the project and the changing EPA guidance on the application of dispersion models, EPA Region 9 approved the use of AERMOD for this study.

Use of AERMOD for the study has two distinct advantages. The first advantage is that AERMOD uses improved model algorithms that more closely simulate plume dispersion in the atmosphere than many other models; and the second advantage is that modeling data developed for this study will not become outdated when AERMOD is officially recognized as the standard model for PSD increment applications.

#### 4.2 MODELING METHODOLOGY

The dispersion modeling analysis was performed to estimate the PSD increment consumed or expanded from industrial and other pollutant emission sources in the three planning areas. Modeling was performed to evaluate incremental impacts of NO<sub>2</sub>, SO<sub>2</sub>, and PM<sub>10</sub>, as triggered in the separate HAs, for all applicable averaging periods. The applicable averaging periods and associated PSD increments addressed in this study are shown in Table 4-1.

Separate model runs were executed for each of the planning areas; for each facility; for each PSD increment triggered pollutant; for both the baseline year and the current year emission inventories; for short-term and long-term averaging periods as applicable; and for each year of meteorological data processed for the study. More than 200 model runs were completed for this study. These model runs were based on emissions of PSD triggered pollutants described in Section 3.0. Emissions from all sources that were operating as of each baseline date were included in the baseline year modeling runs. Emissions from all applicable sources operating as of the study years 1998 and 1999, and source data that were amended with 2002 data for certain facilities in HA83, were modeled in the current year modeling runs. Output files from these two sets of modeling were post-processed to subtract baseline year impacts from current year impacts, resulting in PSD increment consumption. Using this methodology provides output that can account for PSD increment expansion as well as increment consumption.

Because meteorological data was not available for the minor source baseline period for HA76, a paired-in-time/paired-in-space approach was used for post-processing to determine increment values. Pairing in time means that results generated for every modeled averaging period using the baseline meteorological year are subtracted from the current results generated for the same averaging period modeled using the current year meteorological data. A paired-in-space analysis compares results on a receptor-by-receptor basis by subtracting baseline results at a receptor from current results at the same receptor.

TABLE 4-1
PREVENTION OF SIGNIFICANT DETERIORATION INCREMENTS

	Prevention of Si	Prevention of Significant Deterioration Increment (µg/m³)										
Averaging Period	$NO_2$	$NO_2$ $SO_2$ $PM_{10}$										
3-Hour	N/A	512	N/A									
24-Hour	N/A	91	30									
Annual	25	20	17									

N/A Not applicable

μg/m<sup>3</sup> micrograms per cubic meter

The HA76 analysis was completed using the paired-in-time/paired-in-space method of determining increment consumption because the baseline trigger date for SO<sub>2</sub> in HA76 occurred in 1982, and there was no complete meteorological data set representative of the Tracy site for the year prior to the baseline year. Because there were no reliable baseline meteorological data, the baseline and current modeling analyses were completed using the current meteorological data sets from 2000 and 2001. Since baseline meteorological data was not available, the paired-in-time/paired-in-space methodology was the most appropriate approach for determining increment impacts in HA76.

When conducting a paired-in-time/paired-in-space analysis for 3-hour SO<sub>2</sub> increments, the baseline and current model runs generate impacts for each 3-hour period in the year of meteorological data used in the modeling. Both the baseline and current runs generate impact results for eight identical 3-hour periods per day for 365 days per year. The results from all the 3-hour periods are paired according to the date and time when they occurred, which makes the analysis paired-in-time. Each baseline result is subtracted from the matching paired-in-time current result. This analysis occurs for each set of results associated with every individual receptor, which also makes the analysis paired-in-space. After the paired-in-time/paired-in-space calculations are complete, there are 2920 (8760 hours/year ÷ 3 hour blocks) 3-hour increment results for each receptor for a year that is not a leap year, such as 2001. There would be 8 additional 3-hour increment results, 2928, for each receptor for a leap year such as 2000. The second highest increment result for each receptor is selected to represent increment consumption at that receptor. The original Truckee River Corridor study submitted to NDEP in early 2002 was completed using a paired-in-time/paired-in-space analysis.

An unpaired-in-time/paired-in-space methodology was used to determine increment values for HA83 and HA85. The unpaired-in-time/paired-in-space analysis eliminates emphasis on specific time-bound increment results while maintaining the spatial component of the increment analysis. Using the SO<sub>2</sub> example above, this methodology consists of determining baseline and current impact results for a 3-hour time period at every receptor. The second highest modeled impact at each receptor is determined from

the baseline results, and the second highest modeled impact at each receptor from the current results is also selected. Therefore, there is one baseline scenario result and one current scenario result associated with each receptor. The second high baseline impacts at each receptor may or may not occur at the same time of the year as the second high current impacts. The second high baseline results are subtracted from the second high current results on a receptor-by-receptor basis, which gives unpaired-in-time/paired-in-space increment results.

The minor source baseline trigger dates were in 1994 and 1996 for HA 83 and HA 85, respectively. Meteorological data were available at Sierra Pacific's Tracy facility for the years prior to both baseline dates, 1993 and 1995. Baseline models for HA83 were run using 1993 meteorological data, and HA85 baseline runs were completed using 1995 data. Because actual baseline meteorological data was available for the HA83 and HA85 studies, the unpaired-in-time/paired-in-space methodology was chosen for these increment analyses.

When conducting modeling for increment tracking, all PSD increment consuming and expanding emissions located in the specified planning area were included in the analysis. In addition, all PSD increment consuming and expanding emissions from major stationary sources within 50 km of the HAs were included in the analysis.

#### 4.3 MODEL SETUP AND APPLICATION

The AERMOD model contains three modules: two pre-processors and the dispersion model. Model receptors are developed with the AERMAP pre-processor, meteorological data are developed with the AERMET pre-processor, and the model algorithms are applied with AERMOD.

For the original Truckee River Corridor study, Tetra Tech downloaded the appropriate AERMOD, AERMAP, and AERMET model code files from the EPA website. The code was then compiled using Lahey FORTRAN 90 (LF90), which was the same program used by EPA to compile the code. The EPA website also had AERMOD executable files available, but because array sizes in the FORTRAN code needed to be increased to handle the large number of sources and receptors, Tetra Tech recompiled the FORTRAN code. Tetra Tech used LF90 to compile AERMOD, AERMAP, AERMET, and the post processor programs. However, the LF90 version Tetra Tech purchased from Lahey contained errors that caused model results from the AERMOD analysis to differ from the model results produced by the EPA executable AERMOD program. After this problem was discovered, Tetra Tech acquired a new version of LF90 that did not contain errors and recompiled all the executables for the current Truckee River Corridor study. Extensive testing of these new executables confirmed that model results were identical to these

produced using the EPA version. The new versions of the AERMOD, AERMAP, AERMET, and the post processor executables were used in this study.

Applications of AERMOD, AERMAP, and AERMET are discussed in the following sections.

#### **4.3.1 AERMAP**

The terrain preprocessor AERMAP was used to extract receptor elevation data from USGS Digital Elevation Model (DEM) files for use as input to AERMOD. DEM data files were downloaded from the USGS Internet site in 7.5-minute resolution (1-degree resolution is also available). The specific data files selected covered the complete geographic study areas. Receptor locations for the study area were based on North American Datum of 1983 (NAD 83); however, because the DEM data available through the USGS are based on North American Datum of 1927 (NAD 27), Tetra Tech converted DEM files to NAD 83 using GIS techniques to be compatible with the receptor locations for the study area. After the conversion, DEM files were processed using a utility program to add delimiters to records in the uncompressed files (as described in the AERMAP user's guide).

A runstream file for AERMAP was created in accordance with the structure and syntax rules of the program. The selected DEM files and the receptor grids were external inputs referenced in the AERMAP runstream file. Initial attempts to run the AERMAP program failed, generating errors related to lack of adjacent DEM files. Replacement of the NAD 83 DEM files with the original files downloaded from the USGS site based on NAD 27 removed these errors. Tetra Tech deduced that projecting the receptor locations into NAD 27 would likely offer a solution to the problem of mismatched datum. The receptor location data were therefore converted to coordinates based on NAD 27 for use in the program; following processing, the receptor coordinates were converted back to NAD 83. Other errors received during initial attempts to run AERMAP were related to selection of the appropriate DEM files for the study area domain coordinates. These errors were corrected by including all DEM files within geographic coverage of the selected domain coordinates, including those that did not necessarily overlap receptor locations. Upon successful completion of the program, AERMAP generated a text output file containing a receptor elevation for each receptor coordinate in the receptor grid files. In addition, AERMAP generated a height scale for each receptor. A height scale is a measure of the height and distance of the local terrain feature that has the greatest influence on dispersion for that receptor.

Separate dispersion model receptor grids were generated with the AERMAP software for HA76, HA83, and HA85. The receptor grids covered the entire area of each HA, with individual receptors located 500

meters apart. Additional model receptors were identified surrounding large industrial sources where high pollutant concentrations were expected so that maximum concentrations would be identified. These additional receptors extend 3-km from each stationary source with 100-meter receptor spacing up to 1 km from the sources, and 250-meter receptor spacing from 1 to 3 km from large sources. Receptors located inside stationary source fencelines were not eliminated from the initial modeling analysis. Model results at receptors inside property fencelines may not represent accurate modeled increment consumption values because an emission source does not consume PSD increment within its own fenceline. In cases where exceedences were initially predicted inside fencelines, the results were put through refined post-processing to eliminate impact contributions by the sources whose boundary the receptors were located within.

#### **4.3.2 AERMET**

The meteorological data pre-processor AERMET was used to develop meteorological input data for the AERMOD modeling analysis. The AERMET software processes surface meteorological data and twice-daily upper air sounding data into the proper format using a three-stage process. The first stage extracts the data and administers several data quality checks. The second stage merges the data, and the third stage estimates required boundary layer parameters and writes the data in a format readable by AERMOD.

Meteorological data collected from Sierra Pacific Power Company's Tracy Generating Station (Tracy) during 2000 and 2001 were used for this modeling analysis. These two years of data were processed into model-ready format using AERMET. An additional surface dataset collected from the National Weather Service (NWS) station in Reno was used as input to AERMET. This dataset was used to substitute for any missing values from the Tracy data, and to provide additional information for AERMET processing. The final surface data requirement included estimates of the albedo of the ground, Bowen ratio, and surface roughness. These input values were estimated using guidance in the *User's Guide for the AERMOD Meteorological Preprocessor (AERMET)*. The last input data requirement for AERMET is twice-daily upper air sounding data. Sounding data were obtained from the National Climatic Data Center (NCDC), and include upper air soundings from Reno, Nevada for the years 2000 and 2001.

#### **On-Site Surface Data**

The Tracy meteorological tower collects many atmospheric variables. Most of the collected data were used in AERMET processing, including wind speed and wind direction at three levels (10, 55, and 100 meters), barometric pressure, temperature, relative humidity, standard deviation of horizontal wind

direction at all three levels, and standard deviation of vertical wind speed at all three levels. Use of data at three wind levels provides a better estimate of boundary layer conditions.

### **NWS Surface Data**

AERMET is designed to extract NWS surface data from several different formats including CD-144, SCRAM, and SAMSON. NCDC's standard data storage format has been CD-144 format for many years. However, NCDC no longer uses this format and any newer data is stored in TD-3280 format, which is not easily converted to a format usable by AERMET. Since the 2000-2001 NWS Reno data were stored in the new format, they had to be converted to CD-144 format. In addition, the Reno data did not include values opaque cloud cover. Because AERMET uses these values, they had to be estimated from other variables collected for each hour, including total cloud cover and present weather. After NWS surface data were converted to CD-144 format, they were extracted, quality checked, and merged with quality checked on-site data.

# **NWS Upper Air Data**

Reno, Nevada upper air sounding data for 2000 and 2001 were obtained in TD-6201 format. These data were extracted by AERMET, quality checked, and merged with the two surface datasets.

After all three datasets were merged, the final processing stage was executed to produce the model ready data. This final stage calculates boundary layer parameters that are subsequently used by AERMOD. The final processing stage was completed with modified AERMET software that corrected problems that occurred when missing data were encountered in the upper air soundings.

#### **4.3.3 AERMOD**

AERMOD was run using the regulatory default mode. Emission sources, model receptors, and meteorological data were contained in separate files and opened during model execution. Output from the model was stored in binary files and used for post-processing. See Section 4.5 for a discussion of post-processing techniques.

# 4.4 EMISSION SOURCE CHARACTERIZATION

A PSD increment emission inventory was developed for each applicable pollutant for input into AERMOD (see section 3). Emission source data collected by Tetra Tech were used to establish an emission inventory that details emissions and source parameters for the following:

- SO<sub>2</sub> and PM<sub>10</sub> emissions and source parameters for major stationary sources that existed on the major source baseline date of January 6, 1975
- NO<sub>2</sub> emissions and source parameters for major stationary sources that existed on the major source baseline date of February 8, 1988
- Emissions and source parameters for SO<sub>2</sub> emissions from stationary, area, and mobile sources that existed on:
  - The HA76 SO<sub>2</sub> minor source baseline date of October 26, 1982
  - The HA83 SO<sub>2</sub> minor source baseline date of March 11, 1994
  - The HA85 SO<sub>2</sub> minor source baseline date of January 9, 1996
- Emissions and source parameters for NO<sub>2</sub> emissions from stationary, area, and mobile sources that existed on:
  - The HA83 NO<sub>2</sub> minor source baseline date of March 11, 1994
- Emissions and source parameters for PM<sub>10</sub> emissions from stationary, area, and mobile sources that existed on:
  - The HA83 PM<sub>10</sub> minor source baseline date of March 11, 1994

Dispersion modeling was conducted using emission inventories based on the above baseline dates to identify increment consuming and expanding sources.

The emission inventories represent allowable emissions for the current inventory and, where possible, actual emissions for the baseline inventories. Because historical records for sources dating back to the baseline years do not always contain the required information for determining actual emissions, allowable emissions were used where actual emissions are not available or cannot be reliably estimated. Sources that are either partially or fully represented with allowable emissions instead of actual emissions are:

- Sierra Pacific Tracy
- Gopher Construction
- Eagle-Picher Minerals Inc.
- All-Lite Aggregate
- CR Minerals Corporation
- Rilite Aggregate

The emission inventories were constructed for the modeling study with three basic types of emission sources: industrial sources; mobile sources such as on-road vehicles and locomotives; and county-wide emission sources representing all other emissions that cannot be individually quantified. The following subsections detail how these emission types were characterized in the dispersion modeling analysis.

#### 4.4.1 Industrial Sources

Industrial sources were input to the model using source parameters and emission data obtained during Tetra Tech's data collection activities. Current emissions were based on the most recent available data on a source's permitted allowable emissions. Most of this information came from NDEP's Paradox database, which keeps track of current permitted emissions and source parameters. The date of emissions information used in the analysis was documented for each stationary source.

Baseline emission source data represent stationary source operations as of a given baseline date, and were based on available records from the closest date prior to the baseline date. In other words, Tetra Tech used emission data as near to the baseline date as possible where records exist, but before the baseline trigger date. In some cases, the only recorded emission data are two to three years prior to a given baseline date.

Generally, industrial sources were modeled using AERMOD's point source algorithms. Stack-type emissions from the industrial facilities were modeled as point sources using stack parameters obtained during data collection activities. In some cases, stack parameters are different between the baseline year and the current year. In these cases, the modeling took into account the changes in stack parameters (provided both sets of stack parameters were reliable) to more accurately reflect the impact the changes had on the increment. Following guidance from NDEP, some process fugitive emission units were modeled as point sources and were assigned a 10 meter stack height, ambient temperature, 0.01 meters per second exit velocity, and 1.0 meter stack diameter, which represents an average equivalent diameter for these types of sources. However, process fugitive emission units (such as conveyor transfer points) at the All-Lite and Eagle Picher facilities were modeled as volume sources.

Some sources are limited to fewer than 24 daily operation hours and it is impossible to know which hours a source will operate. Therefore, each source in the inventory that is limited to less than 24 operation hours per day was carefully evaluated. It was determined that these sources have an insignificant impact on PSD increment consumption due to their low emission rates. As a result, these sources were simulated in the model as if they operated 24-hours per day in order to simplify the model input. The only exception to this is the updated Eagle-Picher model input data. Specific hours of operation data were provided by NDEP and subsequently incorporated into the modeling.

AERMOD currently uses the same direction-specific building downwash algorithms used by the ISC3 model. Because of the overall large number of sources in the modeling analysis, it was considered prohibitive to include building downwash for all sources in this study, although it is NDEP policy to

include building downwash in dispersion modeling analyses. Due to the potential relative importance of impacts from major sources, building downwash parameters were included for major sources in the modeling for HA76, 83, and 85. Building downwash parameters obtained for major sources during data collection activities were input to AERMOD to calculate building downwash effects.

#### 4.4.2 Mobile Sources

Countywide vehicle mobile source emissions for each of the years representing the minor source baseline dates of interest were input to the model to evaluate the incremental difference in vehicle impacts since the applicable PSD baseline dates. Mobile source emissions were apportioned into 1-km by 1-km grid cells across the respective HAs. The countywide emissions from NET were apportioned into the separate appropriate grid cells by the ratio of known length of roads in the county to the known length of road in each grid cell, and by the VMT data available from the U.S Department of Transportation (DOT). The EPA State Implementation Plan guidance was used as a technical reference for these analyses. The SIP guidance provides selection of road mileage distribution for emission apportionment as an option, which is consistent with this analysis.

The estimated emissions of SO<sub>2</sub>, PM<sub>10</sub>, and NO<sub>2</sub> from vehicle mobile sources that are apportioned to each 1-km grid cell were added to the total fugitive emissions from that grid cell. The total fugitive emissions of each pollutant from that grid cell were modeled as area sources using AERMOD for separate predicted SO<sub>2</sub>, PM<sub>10</sub>, and NO<sub>2</sub> increment impacts.

### 4.4.3 Fugitive Sources

Fugitive emissions from the EPA NET database were distributed on a county-by-county basis within the 1-km grid cells for use in AERMOD. As with the mobile source inventory, the established EPA SIP guidance was used as a technical reference. The SIP guidance for rural/small urban emission allocation was used as a protocol to distribute the NET emission data based on population in the HAs. For example, assume one study area that is exactly 25 percent (%) of the county size, and contains 50% of the county's population. Also, assume that population data are organized in exactly the same shape as the study area. Tetra Tech reviewed the population of the study area in relation to the population of the entire county. The emission data allocated to the study area were the same percentage as the population of the study area compared to the population of the entire county, in this example, 50%. These data were then distributed to the grid cells for modeling purposes accordingly so the sum of the emission data for each grid cell in

the study area will equal 50% of the county's total emissions, even though the study area only represents 25% of the county's area.

Each 1-km by 1-km area source used in the modeling was assigned an elevation equal to the average elevation within the grid cell. This approach has been used for fugitive sources in similar studies (SW Colorado Increment consumption study), and is supported by EPA (EPA 2001). Because there are many area sources within each HA, and area sources require considerable processing time for the dispersion model, area sources were excluded from the modeling analysis if they were determined to have an insignificant impact on air quality. For purposes of this study, an area source was estimated to have an insignificant impact if its emissions would contribute less than or equal to  $\chi_{100}$  of the applicable PSD increment limit for 24-hour PM<sub>10</sub>. A source's significance was estimated based on its total emissions and from test model runs. Area sources with a total emission rate less than or equal to 6.5E-9 grams per second per square meter (g/s-m²) were estimated to have an insignificant impact based on model test runs.

#### 4.5 POST-PROCESSING

Model output files from AERMOD were combined in a post-processing step to determine PSD increment consumption. Pollutant impacts from baseline sources were subtracted from pollutant impacts from current sources on a receptor-by-receptor basis, with the difference resulting in PSD increment consumption. In some cases, the baseline impacts were greater than current impacts. This scenario resulted in PSD increment expansion at those receptors.

To accomplish both the unpaired-in-time and paired-in-time analyses, a FORTRAN executable program that was written in Lahey FORTRAN 90 was used to post-process the baseline and current modeling results. The name of the program is GETINCSS. The code for the program is contained in Appendix H.

GETINCSS reads several unformatted impact files produced by the baseline or current AERMOD runs and one file for the corresponding receptor set. Each unformatted impact file must contain predicted concentrations for a single averaging period. GETINCSS is designed to work with input files that contain predicted impacts for one year of meteorological data at every receptor for a single averaging period. The averaging periods may range from 1 hour to 24 hours or the modeling period, which is typically 1 year. Averaging periods between 24 hours and the modeling period will not work with the post-processor. The receptor file used for post processing is identical to the AERMOD modeling receptor file. It is critical that the receptor file used is the exact same file used in the AERMOD modeling so that predicted impacts and can be properly paired on a receptor-by receptor basis.

For the unpaired-in-time analysis, baseline and current impacts are processed separately. GETINCSS combines the predicted baseline-year or current-year impacts into a file that contains a predicted impact value at each receptor by adding the impacts from the baseline or current unformatted files together. The program writes the total current or baseline impacts in a space delimited text format on a receptor-by-receptor basis.

The results from the current and baseline impacts post-processing are then compared in an Excel spreadsheet to determine increment consumption and expansion on a receptor-by-receptor basis. Baseline impacts are subtracted from current impacts, and this occurs regardless of when the baseline or current impact for each receptor occurred in time.

For the paired-in-time analysis, GETINCSS can be used to process both baseline and current impact files at the same time. The output created by the program contains paired-in-time increment values. GETINCSS reads several input data files, including files representing the baseline-year and current-year predicted impacts, and one for the corresponding receptor set. These impact files are combined into predicted increment values at each receptor.

GETINCSS combines the predicted baseline-year and current-year impacts into a predicted increment value at each receptor by subtracting the baseline-year impact from the current-year impact. The calculations are performed for each averaging period during the modeled meteorological year. Then, the program selects the highest increment value observed at each receptor and writes these results to an output file.

GETINCSS uses a general input file with a predefined format called *getincss.inp*. The program creates an output file called *incrment.dat*. Two examples of the predefined input file format that allows the user to get the predicted increment value is shown and described below. The first example is for an unpaired-in-time analysis, and the second is for a paired-in-time analysis.

# <u>Example 1: GETINCSS input files (getincss.inp) for an Unpaired-in-Time Analysis</u> – Baseline and current impacts are processed separately.

Baseline: 24		Current: 24	
ALNO00BA.AN	1.0	ACNO00CU.AN	1.0
ARNO00BA.AN	1.0	ALNO00CU.AN	1.0
FRNO00BA.AN	1.0	ARNO00CU.AN	1.0
GRN000BA.AN	1.0	BPN000CU.AN	1.0
NCNO00BA.AN	1.0	EPNO00CU.AN	1.0
NTNO00BA.AN	1.0	FRNO00CU.AN	1.0
RANO00BA.AN	1.0	GONO00CU.AN	1.0
SPNO00BA.AN	1.0	GRN000CU.AN	1.0
366		KKN000CU.AN	1.0
		NANO00CU.AN	1.0
		NCNO00CU.AN	1.0
		NTNO00CU.AN	1.0
		QPN000CU.AN	1.0
		RFN000CU.AN	1.0
		SPN000CU.AN	1.0
		TRN000CU.AN	1.0
		366	

# <u>Example 2: GETINCSS input file (getincss.inp) for a Paired-in-Time Analysis</u> – Baseline and current impacts are processed together.

```
24
ALNOOOBA.AN -1.0
ARNOOOBA.AN -1.0
FRNO00BA.AN -1.0
GRNO00BA.AN -1.0
NCNO00BA.AN -1.0
NTNO00BA.AN -1.0
RANOOOBA.AN -1.0
SPNO00BA.AN -1.0
ACNOOOCU.AN 1.0
ALNOOOCU.AN 1.0
ARNOOOCU.AN 1.0
BPN000CU.AN 1.0
EPNO00CU.AN 1.0
FRNOOOCU.AN 1.0
GONOOOCU.AN 1.0
GRN000CU.AN 1.0
KKNO00CU.AN 1.0
NANOOOCU.AN 1.0
NCNO00CU.AN 1.0
NTNOOOCU.AN 1.0
QPNO00CU.AN 1.0
RFN000CU.AN 1.0
SPNOOOCU.AN 1.0
TRNOOOCU.AN 1.0
366
```

The first line on the input files describes how many unformatted impact files will be used in the post processing. Tetra Tech modeled each facility separately, so the post processing input files includes the number of facilities evaluated for each baseline and current analysis for each pollutant and averaging period. The next section of the input file lists the names of the files to be included in the post processing routine. A multiplier of 1.0 is applied to the baseline files in the unpaired-in-time analysis because the impacts need to be added together and not subtracted for this analysis. A multiplier of -1.0 is applied to the baseline files in the paired-in-time analysis, and a multiplier of 1.0 is applied to the current files. The baseline multiplier tells GETINCSS to subtract the baseline impacts from the total increment, and the current multiplier tells the program to add the current impacts to the total increment. The multipliers are listed after each file name. The last line of the input file tells the program how many meteorological days are being post processed. This feature was added so that post processing could be performed on impacts determined using leap year meteorological data files. To run GETINCSS, follow the steps below:

- Create a folder in which the post processing can be accomplished.
- Make sure this folder contains a copy of GETINCSS, the input file named *getincss.inp*, and the AERMOD receptor file used to model baseline and current impacts.
- Copy or rename the AERMOD receptor file to *receptor.dat*
- Copy or move all the unformatted impact files being used in the post processing into the folder.
- Create the *getincss.inp* input file for the first processing routine.
- Make sure all the unformatted impact files to be incorporated into the post processing are both listed in the *getincss.inp* input file and present in the folder in which the post processing will take place.
- Open a DOS prompt and go to the directory in which all the post processing files are located.
- Type the name of the post processor, GETINCSS, and hit enter. The post processor will read the input file, and the *increment.dat* increment file will be produced in the folder with the other files.
- Rename the GETINCSS output file, *incrment.dat*, with identifying characters (see the recommended naming convention in the text below)

It is recommended that the *incrment.dat* output file from GETINCSS be renamed using the following nomenclature for the unpaired-in-time analysis:

#### PPMMHHXX.AA

#### Where:

PP = Two characters representing the pollutant modeled, such as SO for  $SO_2$ , PM for  $PM_{10}$ , and NO for  $NO_x$ 

MM = Two characters representing the year of the meteorological data used, such as 00 for 2000.

HH = Two characters representing the averaging period of the modeling, such as 24 for 24-hour, 03 for 3-hour and AN for annual

XX= Two characters that read either 'CU' which stands for current or 'BA' for baseline

AA = Two characters representing the air quality control region, such as 76 for HA76, 83 for HA83, or 85 for HA85

For the paired-in-time analysis, it is recommended that the *incrment.dat* output file from GETINCSS be renamed using the following nomenclature:

#### AAPPMMIN.HH

Where:

AA = Two characters representing the air quality control region, such as 76 for HA76, 83 for HA83, or 85 for HA85

PP = Two characters representing the pollutant modeled, such as SO for  $SO_2$ , PM for  $PM_{10}$ , and NO for  $NO_x$ 

MM = Two characters representing the year of the meteorological data used, such as 00 for 2000.

IN = Two characters that read 'IN' which stands for increment results

HH = Two characters representing the averaging period of the modeling, such as 24 for 24-hour, 03 for 3-hour and AN for annual

#### 4.6 PSD INCREMENT CONSUMPTION RESULTS

There were no  $SO_2$  PSD increment exceedences predicted in HA76, HA83, or HA85. Additionally, there were no annual  $PM_{10}$  PSD increment exceedences predicted in HA83. There were numerous annual  $NO_2$  and 24-hour  $PM_{10}$  PSD exceedences predicted in HA83. The following sections give modeling results for each HA in the study. Modeling files for  $NO_2$ ,  $SO_2$  and  $PM_{10}$  can be found in Appendix I.

#### 4.6.1 HA76

HA76 was modeled for SO<sub>2</sub> impacts using the protocol described in Section 4.2 through Section 4.5. The modeling showed no predicted exceedences of the 3-hour, 24-hour, or annual SO<sub>2</sub> increment in HA76. Figures 4-1a through 4-3b (Appendix C) show the distribution of 3-hour and 24-hour high, second-high and annual SO<sub>2</sub> increments in HA76 for 2000 and 2001 meteorological data. The increment values

pointed out on the maps represent the highest increment values in ambient air, which is outside any facility fenceline. Table 4-2 presents the highest second-high predicted 3-hour and 24-hour impacts and maximum annual impacts for modeling with the 2000 and the 2001 meteorological data.

As can be seen in Figures 4-1a, 4-1b, 4-2a, and 4-2b (Appendix C), the maximum predicted 3-hour and 24-hour SO<sub>2</sub> PSD impacts are just a small fraction of the allowable increment.

The modeling results for annual  $SO_2$  increment reflected in Figure 4-3a and 4-3b (Appendix C) show many increment impacts below  $0~\mu g/m^3$  (negative values) across the planning area, which is far less than the allowable annual PSD increment of  $20~\mu g/m^3$  and indicates increment expansion. The low annual  $SO_2$  increment impacts across HA76 are due to the relative lack of  $SO_2$  increment consuming point sources in conjunction with the low difference between annual  $SO_2$  emissions for current vehicle traffic associated with the highways, as compared to  $SO_2$  emissions from these sources in the baseline year of 1982. The annual  $SO_2$  PSD impacts show large areas of the basin with slight increment expansion. The highest predicted annual  $SO_2$  increment consumption was  $4.55~\mu g/m^3$ .

### 4.6.2 HA83

The modeling protocol described in Section 4.2 through Section 4.5 was used to model  $SO_2$ ,  $PM_{10}$ , and  $NO_2$  PSD increment impacts in HA83. No exceedences of the 3-hour, 24-hour, or annual  $SO_2$ , or the annual  $PM_{10}$  PSD increment were predicted using this protocol. However, there were PSD modeled increment violations of annual  $NO_2$  and 24-hour  $PM_{10}$  in HA83. The PSD increment consumption modeling results for HA83 are presented in Table 4-3 and explained further in the remainder of this section.

# $\underline{SO}_2$

The SO<sub>2</sub> modeling predicted no SO<sub>2</sub> PSD increment exceedences in HA83. Table 4-3 reflects increment values given by the modeling and post processing. Figures 4-4a through 4-6b (Appendix C) show the distribution of predicted 3-hour, 24-hour and annual SO<sub>2</sub> impacts, respectively, in HA83.

**TABLE 4-2** HA76 SO<sub>2</sub> PSD INCREMENT CONSUMPTION

Averaging Period	2000 Modeled $SO_2$ Increment Consumption $(\mu g/m^3)$	$\begin{array}{c} \textbf{2001 Modeled} \\ \textbf{SO}_2 \textbf{Increment} \\ \textbf{Consumption} \\ (\mu \textbf{g/m}^3) \end{array}$	SO <sub>2</sub> Increment Limit (μg/m³)
3-Hour <sup>1</sup>	22.41	20.75	512
24-Hour <sup>1</sup>	5.98	6.27	91
Annual <sup>2</sup>	0.40	4.55	20

High Second-High

Maximum

**TABLE 4-3** HA83 SO<sub>2</sub>, PM<sub>10</sub>, AND NO<sub>2</sub> PSD INCREMENT CONSUMPTION

Pollutant	Averaging Period	2000 Modeled Increment Consumption (µg/m³)	2001 Modeled Increment Consumption (µg/m³)	PSD Increment Limit (µg/m³)
$SO_2$	3-Hour <sup>1</sup>	82.32	-1.79	512
	24-Hour <sup>1</sup>	14.02	41.51	91
	Annual <sup>2</sup>	0.01	0.02	20
$PM_{10}$	24-Hour <sup>1,3</sup>	58.27	51.51	30
	Annual	16.73	15.26	17
$NO_2$	Annual	$34.08^3$	23.714	25

#### **Notes:**

- High Second-High
- Maximum
- Modeled increment values represent highest concentrations in ambient air  $NO_2$  results are based on a conversion of  $(0.75)NO_x = NO_2$

Increment consumption values on the maps represent the highest increment values predicted in "ambient air" for annual  $SO_2$  increment modeling and high second-high values for 3-hour and 24-hour  $SO_2$  increment modeling. "Ambient air" is defined as property that is outside any facility fenceline to which the public has access. Figures 4-4a, 4-4b, 4-5a, and 4-5b (Appendix C) reflect results for 3-hour and 24-hour  $SO_2$  PSD increment consumption for 2000 and 2001. These maps show that increment consumption across HA83 was well below the respective increment limits. The highest 3-hour and 24-hour increment consumption results occur due east of the Naniwa facility, with Naniwa sources contributing the vast majority of the total  $SO_2$  increment consumption.

As shown in Figure 4-6a and 4-6b (Appendix C), annual SO<sub>2</sub> increment impacts in HA 83 result in increment expansion across most of the planning area, with the exception of a portion near the Eagle Picher facility. The general expansion of annual SO<sub>2</sub> increment across HA 83 is due to the reduction in SO<sub>2</sub> emissions for current vehicle traffic associated with the highways, as compared to SO<sub>2</sub> emissions from these sources in the baseline year of 1994. In addition, SO<sub>2</sub> increment expansion has taken place due to SO<sub>2</sub> reductions from the Tracy Generating Station. The highest PSD increment consumption outside a facility fenceline occurs northeast of the Eagle Picher facility. The maximum annual SO<sub>2</sub> increment consumption outside facility fencelines was 0.41 μg/m<sup>3</sup>.

# $\underline{NO}_2$

Figures 4-7a and 4-7b (Appendix C) show the distribution of annual  $NO_2$  increment impacts in HA83 for the 2000 and 2001 modeling, respectively. These figures show that most of the HA83 annual  $NO_2$  PSD impacts are significantly less than the allowable increment. However, there are several PSD increment exceedences in HA83 for the 2000 model year. There were no increment exceedences in the 2001 modeling. The highest  $NO_2$  PSD increment consumption for HA83 occurs in the north-central portion of the basin north of Tracy near the highway and is due to railroad/vehicle/miscellaneous fugitive emissions. The maximum annual  $NO_2$  PSD increment consumption value modeled in HA83 is 34.1  $\mu$ g/m³. Table 4-4 shows a breakdown of the 137 predicted  $NO_2$  exceedences using 2000 meteorological data. This breakdown indicates whether the  $NO_2$  increment consumption at each receptor location is due to area source or point source contributions.

All the NO<sub>2</sub> exceedences are caused by area sources. Tetra Tech used 100% of the NO<sub>2</sub> area source emissions for this study. However, there are several studies that indicate Gaussian plume models over predict modeled concentrations due to low-level fugitive emissions, and there are several that recommend that a scaling factor be applied to fugitive emissions estimated for modeling. One EPA study

recommends that only 25% of fugitive dust emissions be used for particulate modeling, but this study does not mention applying it to other pollutants such as NO<sub>2</sub> modeling. The Texas Commission on Environmental Quality (TCEQ) conducted another study on low-level fugitive emissions. This study appears to apply to all pollutants modeled as low-level fugitive values. An interoffice TCEQ memorandum, titled *Modeling Adjustment Factor for Fugitive Emissions* (TCEQ 2002), describes a modeling adjustment factor of 0.6 (60%) developed for fugitive emissions. TCEQ applies this factor to low-level fugitive releases in two ways: (1) the 0.6 factor to the emission rates is applied before input into the model, or (2) the modeled concentrations are multiplied by 0.6 to achieve final results for fugitive modeling. As a test, Tetra Tech post processed the NO<sub>2</sub> results using the TCEQ factor of 0.6 for the area source emissions. This methodology decreased the number of predicted NO<sub>2</sub> exceedences modeled using 2000 meteorological data from 137 to zero. Table 4-5 compares a select group of model results from the study using 100% of the area source emissions and the study using 60% of the area source emissions.

TABLE 4-4 FACILITY CONTRIBUTIONS TO THE PSD INCREMENT CONSUMPTION IN HA83 FOR 2000

Pollutant	UTM East (meters)	UTM North (meters)	Modeled PSD Increment Consumption (μg/m³)	Averaging Period	Source Group	Rank	Current Area Sources (µg/m³)	Current Point Sources (µg/m³)	Baseline Area Sources (µg/m³)	Baseline Point Sources (µg/m³)	Primary Contributor	Primary Contribution (µg/m³)
NO <sub>2</sub>	283100	4382400	34.08	Annual	All	1 <sup>st</sup>	276.29	1.24	229.19	2.89	Area	47.10
$NO_2$	287000	4382000	32.40	Annual	All	1 <sup>st</sup>	156.35	11.63	116.55	8.23	Area	39.80
$NO_2$	283000	4382400	32.35	Annual	All	1 <sup>st</sup>	276.07	1.22	228.65	5.51	Area	47.42
$NO_2$	283200	4381900	32.33	Annual	All	1 <sup>st</sup>	191.41	1.87	145.49	4.68	Area	45.92
$NO_2$	283200	4382000	31.88	Annual	All	1 <sup>st</sup>	209.39	1.71	164.51	4.08	Area	44.88
$NO_2$	283300	4381900	31.61	Annual	All	1 <sup>st</sup>	191.64	1.82	145.74	5.56	Area	45.90
$NO_2$	283100	4381900	31.49	Annual	All	1 <sup>st</sup>	189.82	1.89	144.80	4.93	Area	45.02
$NO_2$	283300	4382000	31.08	Annual	All	1 <sup>st</sup>	209.29	1.73	164.66	4.92	Area	44.63
$NO_2$	283000	4382500	31.07	Annual	All	1 <sup>st</sup>	272.81	1.19	228.00	4.58	Area	44.81
$NO_2$	283100	4382000	31.01	Annual	All	1 <sup>st</sup>	208.63	1.64	163.97	4.97	Area	44.66
$NO_2$	281000	4382250	30.50	Annual	All	1 <sup>st</sup>	245.70	1.50	200.26	6.28	Area	45.44
$NO_2$	283300	4382200	30.39	Annual	All	1 <sup>st</sup>	231.47	1.47	190.19	2.22	Area	41.28
$NO_2$	283000	4381900	30.38	Annual	All	1 <sup>st</sup>	190.51	1.82	144.98	6.85	Area	45.53
$NO_2$	283300	4382500	30.30	Annual	All	1 <sup>st</sup>	268.71	1.24	226.64	2.92	Area	42.07
$NO_2$	283500	4381800	30.22	Annual	All	1 <sup>st</sup>	178.55	1.61	132.64	7.23	Area	45.91
$NO_2$	282900	4382400	30.12	Annual	All	1 <sup>st</sup>	277.22	1.21	230.40	7.87	Area	46.82
$NO_2$	283500	4382000	30.04	Annual	All	1 <sup>st</sup>	213.70	1.71	167.42	7.93	Area	46.28
$NO_2$	283300	4382100	29.97	Annual	All	1 <sup>st</sup>	223.11	1.58	181.05	3.68	Area	42.06
$NO_2$	281250	4382000	29.93	Annual	All	1 <sup>st</sup>	226.27	1.65	180.53	7.49	Area	45.74
$NO_2$	281250	4382250	29.90	Annual	All	1 <sup>st</sup>	268.76	1.44	223.61	6.72	Area	45.15
$NO_2$	283600	4382000	29.87	Annual	All	1 <sup>st</sup>	219.67	1.68	170.96	10.56	Area	48.71
$NO_2$	283000	4381600	29.71	Annual	All	1 <sup>st</sup>	157.80	1.75	115.39	4.54	Area	42.41
$NO_2$	281500	4382000	29.64	Annual	All	1 <sup>st</sup>	233.98	1.70	187.76	8.40	Area	46.22
$NO_2$	283400	4381900	29.60	Annual	All	1 <sup>st</sup>	189.37	1.75	145.10	6.55	Area	44.27
$NO_2$	283200	4382200	29.53	Annual	All	1 <sup>st</sup>	228.06	1.41	188.24	1.86	Area	39.82
NO <sub>2</sub>	283400	4382100	29.36	Annual	All	1 <sup>st</sup>	225.71	1.62	182.81	5.36	Area	42.90
NO <sub>2</sub>	282900	4382500	29.35	Annual	All	1 <sup>st</sup>	273.95	1.19	229.63	6.37	Area	44.32
NO <sub>2</sub>	283200	4382100	29.30	Annual	All	1 <sup>st</sup>	219.60	1.51	179.35	3.01	Area	40.25
NO <sub>2</sub>	283100	4382600	29.25	Annual	All	1 <sup>st</sup>	265.63	1.18	224.64	3.17	Area	40.99

TABLE 4-4 (Continued)
FACILITY CONTRIBUTIONS TO THE PSD INCREMENT CONSUMPTION IN HA83 FOR 2000

Pollutant	UTM East (meters)	UTM North (meters)	Modeled PSD Increment Consumption (μg/m³)	Averaging Period	Source Group	Rank	Current Area Sources (µg/m³)	Current Point Sources (µg/m³)	Baseline Area Sources (µg/m³)	Baseline Point Sources (µg/m³)	Primary Contributor	Primary Contribution (µg/m³)
NO <sub>2</sub>	283000	4382600	29.15	Annual	All	1 <sup>st</sup>	266.07	1.17	224.43	3.94	Area	41.64
$NO_2$	282200	4382200	29.14	Annual	All	$1^{st}$	266.15	1.33	217.59	11.03	Area	48.56
NO <sub>2</sub>	282100	4382400	29.09	Annual	All	1 <sup>st</sup>	263.88	1.24	217.97	8.36	Area	45.91
NO <sub>2</sub>	283300	4382300	29.03	Annual	All	1 <sup>st</sup>	232.24	1.41	194.71	1.34	Area	37.53
$NO_2$	294000	4384500	29.00	Annual	All	$1^{st}$	236.15	3.42	194.83	6.07	Area	41.32
$NO_2$	283000	4381500	28.98	Annual	All	1 <sup>st</sup>	149.38	1.65	108.25	4.14	Area	41.13
$NO_2$	283700	4381800	28.95	Annual	All	1 <sup>st</sup>	180.27	1.55	134.26	8.92	Area	46.01
$NO_2$	282800	4382400	28.87	Annual	All	1 <sup>st</sup>	277.48	1.21	230.86	9.33	Area	46.62
$NO_2$	283400	4382200	28.87	Annual	All	1 <sup>st</sup>	277.48	1.52	191.03	4.37	Area	86.45
$NO_2$	283200	4382500	28.82	Annual	All	1 <sup>st</sup>	257.82	1.22	218.05	2.56	Area	39.77
$NO_2$	276000	4379000	28.80	Annual	All	1 <sup>st</sup>	198.87	1.50	158.34	3.64	Area	40.53
$NO_2$	283400	4382000	28.79	Annual	All	1 <sup>st</sup>	206.25	1.70	163.46	6.10	Area	42.79
$NO_2$	283500	4381900	28.77	Annual	All	1 <sup>st</sup>	189.61	1.68	145.44	7.49	Area	44.17
$NO_2$	283600	4381800	28.74	Annual	All	$1^{st}$	178.90	1.54	134.30	7.85	Area	44.60
$NO_2$	281500	4382250	28.62	Annual	All	1 <sup>st</sup>	271.36	1.38	227.27	7.30	Area	44.09
$NO_2$	280750	4382250	28.57	Annual	All	1 <sup>st</sup>	208.46	1.56	165.98	5.94	Area	42.48
$NO_2$	283400	4381800	28.56	Annual	All	1 <sup>st</sup>	167.51	1.71	124.34	6.80	Area	43.17
$NO_2$	283600	4381700	28.44	Annual	All	1 <sup>st</sup>	165.53	1.52	122.04	7.10	Area	43.49
$NO_2$	283100	4381800	28.37	Annual	All	1 <sup>st</sup>	157.18	2.08	116.31	5.12	Area	40.87
NO <sub>2</sub>	283200	4382300	28.35	Annual	All	1 <sup>st</sup>	232.36	1.34	194.71	1.19	Area	37.65
NO <sub>2</sub>	283500	4382100	28.32	Annual	All	1 <sup>st</sup>	230.18	1.66	185.70	8.37	Area	44.48
NO <sub>2</sub>	282800	4382500	28.28	Annual	All	1 <sup>st</sup>	274.13	1.18	229.98	7.63	Area	44.15
NO <sub>2</sub>	282700	4382400	28.22	Annual	All	1 <sup>st</sup>	277.23	1.21	230.85	9.96	Area	46.38
$NO_2$	275000	4378000	28.20	Annual	All	1 <sup>st</sup>	171.76	2.64	133.26	3.54	Area	38.50
NO <sub>2</sub>	283600	4381900	28.18	Annual	All	1 <sup>st</sup>	191.12	1.63	146.24	8.95	Area	44.88
NO <sub>2</sub>	283700	4381700	28.08	Annual	All	1 <sup>st</sup>	166.13	1.50	122.56	7.62	Area	43.57
NO <sub>2</sub>	283400	4382500	28.07	Annual	All	1 <sup>st</sup>	265.11	1.28	224.48	4.49	Area	40.63
NO <sub>2</sub>	282900	4382600	28.05	Annual	All	1 <sup>st</sup>	267.53	1.17	226.12	5.17	Area	41.41
NO <sub>2</sub>	282800	4381500	28.00	Annual	All	1 <sup>st</sup>	149.97	1.83	109.35	5.12	Area	40.62
NO <sub>2</sub>	282100	4382500	27.96	Annual	All	1 <sup>st</sup>	259.57	1.20	215.85	7.63	Area	43.72

TABLE 4-4 (Continued)
FACILITY CONTRIBUTIONS TO THE PSD INCREMENT CONSUMPTION IN HA83 FOR 2000

Pollutant	UTM East (meters)	UTM North (meters)	Modeled PSD Increment Consumption (μg/m³)	Averaging Period	Source Group	Rank	Current Area Sources (µg/m³)	Current Point Sources (µg/m³)	Baseline Area Sources (µg/m³)	Baseline Point Sources (µg/m³)	Primary Contributor	Primary Contribution (µg/m³)
NO <sub>2</sub>	279000	4381000	27.92	Annual	All	1 <sup>st</sup>	189.07	2.21	148.56	5.50	Area	40.51
$NO_2$	282900	4381400	27.86	Annual	All	$1^{st}$	142.73	1.69	103.29	3.98	Area	39.44
NO <sub>2</sub>	283100	4382100	27.80	Annual	All	1 <sup>st</sup>	219.60	1.46	178.96	5.03	Area	40.64
NO <sub>2</sub>	282800	4381400	27.74	Annual	All	1 <sup>st</sup>	140.15	1.81	100.50	4.46	Area	39.65
$NO_2$	282300	4382200	27.64	Annual	All	1 <sup>st</sup>	265.10	1.31	217.68	11.88	Area	47.42
$NO_2$	282700	4382500	27.60	Annual	All	1 <sup>st</sup>	273.76	1.18	229.85	8.30	Area	43.91
$NO_2$	282800	4381300	27.59	Annual	All	1 <sup>st</sup>	136.93	1.51	97.76	3.90	Area	39.17
$NO_2$	283400	4382300	27.58	Annual	All	1 <sup>st</sup>	234.23	1.46	195.01	3.91	Area	39.22
$NO_2$	282900	4381500	27.54	Annual	All	1 <sup>st</sup>	148.92	1.74	109.50	4.44	Area	39.42
$NO_2$	282900	4381900	27.52	Annual	All	1 <sup>st</sup>	191.11	1.70	145.22	10.90	Area	45.89
$NO_2$	283600	4382100	27.44	Annual	All	1 <sup>st</sup>	239.06	1.71	191.55	12.65	Area	47.51
$NO_2$	282900	4381300	27.37	Annual	All	1 <sup>st</sup>	136.60	1.57	52.71	3.63	Area	83.89
$NO_2$	280500	4382000	27.35	Annual	All	1 <sup>st</sup>	202.10	1.88	161.38	6.13	Area	40.72
$NO_2$	283100	4382200	27.34	Annual	All	1 <sup>st</sup>	227.76	1.37	187.80	4.88	Area	39.96
$NO_2$	282700	4381300	27.32	Annual	All	1 <sup>st</sup>	137.27	1.38	97.91	4.30	Area	39.36
$NO_2$	282800	4382600	27.17	Annual	All	1 <sup>st</sup>	267.62	1.16	226.36	6.20	Area	41.26
$NO_2$	281750	4382000	27.16	Annual	All	1 <sup>st</sup>	230.46	1.69	186.16	9.77	Area	44.30
$NO_2$	285000	4382000	27.12	Annual	All	1 <sup>st</sup>	226.48	3.80	179.77	14.34	Area	46.71
$NO_2$	282000	4382400	27.10	Annual	All	1 <sup>st</sup>	252.75	1.24	209.81	8.04	Area	42.94
$NO_2$	284000	4382000	27.05	Annual	All	1 <sup>st</sup>	232.45	3.00	179.90	19.48	Area	52.55
$NO_2$	283200	4382400	27.02	Annual	All	1 <sup>st</sup>	234.14	1.27	197.88	1.51	Area	36.26
$NO_2$	281750	4382250	26.98	Annual	All	1 <sup>st</sup>	249.16	1.36	206.48	8.07	Area	42.68
$NO_2$	280750	4382500	26.88	Annual	All	1 <sup>st</sup>	190.21	1.56	150.28	5.67	Area	39.93
$NO_2$	280000	4381500	26.86	Annual	All	1 <sup>st</sup>	208.21	2.36	168.68	6.08	Area	39.53
NO <sub>2</sub>	276500	4380000	26.85	Annual	All	1 <sup>st</sup>	192.59	2.19	154.25	4.72	Area	38.34
NO <sub>2</sub>	283100	4382300	26.83	Annual	All	1 <sup>st</sup>	232.02	1.30	194.17	3.37	Area	37.85
NO <sub>2</sub>	281000	4382000	26.82	Annual	All	1 <sup>st</sup>	217.85	1.64	176.96	6.77	Area	40.89
NO <sub>2</sub>	283300	4382400	26.80	Annual	All	1 <sup>st</sup>	235.14	1.31	198.90	1.81	Area	36.24
NO <sub>2</sub>	281250	4381750	26.77 <sup>A</sup>	Annual	All	1 <sup>st</sup>	178.99	2.55	137.50	8.33	Area	41.49
NO <sub>2</sub>	283000	4381800	26.76	Annual	All	1 <sup>st</sup>	172.59	2.07	133.32	5.65	Area	39.27

TABLE 4-4 (Continued)
FACILITY CONTRIBUTIONS TO THE PSD INCREMENT CONSUMPTION IN HA83 FOR 2000

Pollutant	UTM East (meters)	UTM North (meters)	Modeled PSD Increment Consumption (μg/m³)	Averaging Period	Source Group	Rank	Current Area Sources (µg/m³)	Current Point Sources (µg/m³)	Baseline Area Sources (µg/m³)	Baseline Point Sources (µg/m³)	Primary Contributor	Primary Contribution (µg/m³)
$NO_2$	283000	4382000	26.75	Annual	All	1 <sup>st</sup>	205.03	1.54	162.10	8.81	Area	42.93
$NO_2$	281250	4382500	26.67	Annual	All	1 <sup>st</sup>	243.29	1.43	203.06	6.10	Area	40.23
$NO_2$	282700	4382600	26.56	Annual	All	1 <sup>st</sup>	267.22	1.16	226.09	6.88	Area	41.13
$NO_2$	289500	4385500	26.48	Annual	All	1 <sup>st</sup>	224.43	5.39	185.00	9.52	Area	39.43
$NO_2$	276500	4379500	26.44	Annual	All	1 <sup>st</sup>	223.16	1.62	185.59	3.94	Area	37.57
$NO_2$	281000	4382500	26.43	Annual	All	1 <sup>st</sup>	206.82	1.48	167.20	5.87	Area	39.62
$NO_2$	280749.9	4381500	26.30	Annual	All	1 <sup>st</sup>	179.58	6.61	143.80	7.32	Area	35.78
$NO_2$	283899.9	4381700	26.29	Annual	All	1 <sup>st</sup>	162.63	1.66	120.11	9.13	Area	42.52
$NO_2$	282100	4382200	26.19	Annual	All	1 <sup>st</sup>	251.17	1.35	207.30	10.31	Area	43.87
$NO_2$	282300	4382300	26.12	Annual	All	1 <sup>st</sup>	261.56	1.26	217.70	10.29	Area	43.86
$NO_2$	270500	4376500	26.07	Annual	All	1 <sup>st</sup>	156.03	1.68	120.06	2.90	Area	35.97
$NO_2$	271000	4377000	26.07	Annual	All	1 <sup>st</sup>	168.55	1.73	132.44	3.07	Area	36.11
$NO_2$	283000	4382700	26.06	Annual	All	1 <sup>st</sup>	252.85	1.15	215.65	3.61	Area	37.20
$NO_2$	283800	4381500	26.04	Annual	All	1 <sup>st</sup>	146.61	1.45	107.14	6.19	Area	39.47
$NO_2$	283700	4381500	26.04	Annual	All	1 <sup>st</sup>	146.83	1.44	107.60	5.96	Area	39.23
$NO_2$	283200	4382600	26.02	Annual	All	1 <sup>st</sup>	251.24	1.19	214.32	3.42	Area	36.92
$NO_2$	282600	4382400	26.00	Annual	All	1 <sup>st</sup>	269.91	1.21	226.40	10.05	Area	43.51
$NO_2$	293500	4384500	25.98	Annual	All	1 <sup>st</sup>	165.17	1.56	127.66	6.49	Area	37.51
$NO_2$	283500	4382200	25.98	Annual	All	1 <sup>st</sup>	234.04	3.61	192.28	8.68	Area	41.76
$NO_2$	282700	4381500	25.97	Annual	All	1 <sup>st</sup>	149.00	2.03	110.35	6.06	Area	38.65
$NO_2$	283800	4381700	25.96	Annual	All	1 <sup>st</sup>	164.84	1.51	123.50	8.23	Area	41.34
$NO_2$	274000	4377500	25.85	Annual	All	1 <sup>st</sup>	173.46	2.11	137.38	3.23	Area	36.08
$NO_2$	282000	4382500	25.81	Annual	All	1 <sup>st</sup>	247.87	1.20	207.25	7.42	Area	40.62
$NO_2$	283900	4381500	25.78	Annual	All	1 <sup>st</sup>	146.02	1.47	106.62	6.49	Area	39.40
$NO_2$	283800	4381800	25.73	Annual	All	1 <sup>st</sup>	176.66	1.63	133.93	10.04	Area	42.73
NO <sub>2</sub>	282600	4382500	25.70	Annual	All	1 <sup>st</sup>	268.06	1.18	226.42	8.55	Area	41.64
NO <sub>2</sub>	283300	4381800	25.69	Annual	All	1 <sup>st</sup>	145.03	1.87	106.57	6.09	Area	38.46
$NO_2$	280499.9	4381750	25.66	Annual	All	1 <sup>st</sup>	230.57	2.26	192.31	6.31	Area	38.26
NO <sub>2</sub>	283000	4381700	25.65	Annual	All	1 <sup>st</sup>	162.69	1.97	125.52	4.93	Area	37.17
NO <sub>2</sub>	280500	4381000	25.62	Annual	All	1 <sup>st</sup>	154.88	2.26	116.09	6.90	Area	38.79

TABLE 4-4 (Continued)
FACILITY CONTRIBUTIONS TO THE PSD INCREMENT CONSUMPTION IN HA83 FOR 2000

Pollutant	UTM East (meters)	UTM North (meters)	Modeled PSD Increment Consumption (μg/m³)	Averaging Period	Source Group	Rank	Current Area Sources (µg/m³)	Current Point Sources (µg/m³)	Baseline Area Sources (µg/m³)	Baseline Point Sources (µg/m³)	Primary Contributor	Primary Contribution (µg/m³)
$NO_2$	283999.9	4381800	25.61	Annual	All	1 <sup>st</sup>	175.47	2.25	130.85	12.72	Area	44.62
NO <sub>2</sub>	283899.9	4381800	25.57	Annual	All	1 <sup>st</sup>	177.99	1.84	134.36	11.37	Area	43.63
$NO_2$	282500	4381400	25.44	Annual	All	1 <sup>st</sup>	144.03	1.34	104.59	6.86	Area	39.44
NO <sub>2</sub>	284999.9	4382250	25.35	Annual	All	1 <sup>st</sup>	281.32	3.61	236.89	14.23	Area	44.43
$NO_2$	271000	4376500	25.29	Annual	All	1 <sup>st</sup>	165.85	1.74	130.96	2.91	Area	34.89
$NO_2$	283700	4381600	25.28	Annual	All	1 <sup>st</sup>	153.84	1.47	114.99	6.62	Area	38.85
$NO_2$	282200	4382500	25.27	Annual	All	1 <sup>st</sup>	256.52	1.20	216.13	7.90	Area	40.39
$NO_2$	281000	4381750	25.26	Annual	All	1 <sup>st</sup>	196.98	1.86	157.74	7.43	Area	39.24
$NO_2$	274000	4377000	25.21	Annual	All	1 <sup>st</sup>	138.15	1.73	103.10	2.78	Area	35.05
$NO_2$	284000	4381400	25.20	Annual	All	1 <sup>st</sup>	136.66	1.51	98.55	6.01	Area	38.11
$NO_2$	282000	4382300	25.19	Annual	All	1 <sup>st</sup>	245.74	1.30	206.54	8.80	Area	39.20
$NO_2$	282700	4381400	25.18	Annual	All	1 <sup>st</sup>	130.41	1.89	93.58	5.15	Area	36.83
$NO_2$	283000	4381400	25.15	Annual	All	1 <sup>st</sup>	126.18	1.45	90.38	3.99	Area	35.80
$NO_2$	282000	4382100	25.15	Annual	All	1 <sup>st</sup>	236.82	1.72	194.03	10.72	Area	42.79
$NO_2$	276500	4379000	25.13	Annual	All	1 <sup>st</sup>	160.23	1.46	124.54	3.64	Area	35.69
$NO_2$	282600	4381400	25.13	Annual	All	1 <sup>st</sup>	134.29	1.61	96.46	5.94	Area	37.83
$NO_2$	282900	4381800	25.04	Annual	All	1 <sup>st</sup>	172.66	2.05	133.52	7.80	Area	39.14
$NO_2$	282900	4381600	25.03	Annual	All	1 <sup>st</sup>	154.06	1.87	117.49	5.07	Area	36.57
PM <sub>10</sub>	273500	4371500	61.38 <sup>B</sup>	24-Hour	All	2 <sup>nd</sup>	23.06	73.37	29.70	5.35	Point	68.02
PM <sub>10</sub>	274000	4372000	61.14 <sup>B</sup>	24-Hour	All	2 <sup>nd</sup>	23.30	71.51	29.08	4.59	Point	66.92
PM <sub>10</sub>	275000	4373000	59.49 <sup>B</sup>	24-Hour	All	2 <sup>nd</sup>	25.79	113.35	3.49	76.16	Point	37.20
PM <sub>10</sub>	280000	4385000	58.27	24-Hour	All	2 <sup>nd</sup>	72.76	3.85	15.58	2.75	Area	57.17
PM <sub>10</sub>	280500	4385000	57.35	24-Hour	All	2 <sup>nd</sup>	72.78	3.67	17.57	1.53	Area	55.20
PM <sub>10</sub>	279500	4385000	56.76	24-Hour	All	2 <sup>nd</sup>	74.01	1.82	15.88	3.20	Area	58.13
PM <sub>10</sub>	274500	4372500	52.85 <sup>B</sup>	24-Hour	All	2 <sup>nd</sup>	56.91	46.62	19.13	31.55	Area	37.77
PM <sub>10</sub>	282500	4385500	51.78	24-Hour	All	2 <sup>nd</sup>	68.59	3.64	14.26	6.19	Area	54.33
PM <sub>10</sub>	277500	4385000	51.01	24-Hour	All	2 <sup>nd</sup>	68.61	1.88	17.97	1.51	Area	50.63
PM <sub>10</sub>	280000	4385500	50.45	24-Hour	All	2 <sup>nd</sup>	68.47	1.81	15.32	4.50	Area	53.15
PM <sub>10</sub>	277000	4384500	50.00	24-Hour	All	2 <sup>nd</sup>	67.77	2.07	18.08	1.76	Area	49.69
PM <sub>10</sub>	277500	4384500	49.82	24-Hour	All	2 <sup>nd</sup>	68.81	2.32	19.48	1.82	Area	49.33

TABLE 4-4 (Continued)
FACILITY CONTRIBUTIONS TO THE PSD INCREMENT CONSUMPTION IN HA83 FOR 2000

Pollutant	UTM East (meters)	UTM North (meters)	Modeled PSD Increment Consumption (µg/m³)	Averaging Period	Source Group	Rank	Current Area Sources (µg/m³)	Current Point Sources (µg/m³)	Baseline Area Sources (µg/m³)	Baseline Point Sources (µg/m³)	Primary Contributor	Primary Contribution (µg/m³)
$PM_{10}$	276500	4384500	49.65	24-Hour	All	2 <sup>nd</sup>	66.72	2.06	17.16	1.98	Area	49.56
$PM_{10}$	275000	4384500	48.47	24-Hour	All	2 <sup>nd</sup>	63.70	2.80	15.32	2.71	Area	48.38
$PM_{10}$	279000	4384500	47.96	24-Hour	All	2 <sup>nd</sup>	68.72	3.74	22.89	1.60	Area	45.83
$PM_{10}$	273000	4371500	47.92	24-Hour	All	2 <sup>nd</sup>	36.06	41.82	28.27	1.70	Point	40.13
$PM_{10}$	271500	4382000	47.75	24-Hour	All	2 <sup>nd</sup>	70.89	0.78	22.60	1.32	Area	48.29
$PM_{10}$	272500	4371000	47.36	24-Hour	All	2 <sup>nd</sup>	34.47	41.30	26.67	1.72	Point	39.57
$PM_{10}$	275500	4384500	47.33	24-Hour	All	2 <sup>nd</sup>	65.02	2.95	15.48	5.17	Area	49.55
$PM_{10}$	276000	4384500	47.22	24-Hour	All	2 <sup>nd</sup>	66.08	2.76	16.85	4.77	Area	49.23
$PM_{10}$	274500	4384500	46.92	24-Hour	All	2 <sup>nd</sup>	62.33	2.42	14.61	3.22	Area	47.72
$PM_{10}$	275500	4385000	46.60	24-Hour	All	2 <sup>nd</sup>	62.74	1.83	16.41	1.56	Area	46.33
$PM_{10}$	274500	4385000	46.39	24-Hour	All	2 <sup>nd</sup>	59.74	1.61	13.73	1.22	Area	46.01
$PM_{10}$	275000	4385000	46.23	24-Hour	All	2 <sup>nd</sup>	60.97	1.43	15.15	1.03	Area	45.82
$PM_{10}$	274000	4384500	46.12	24-Hour	All	2 <sup>nd</sup>	61.25	2.29	14.43	3.00	Area	46.83
$PM_{10}$	272000	4382000	46.09	24-Hour	All	2 <sup>nd</sup>	71.29	0.88	24.70	1.38	Area	46.58
$PM_{10}$	278000	4385000	46.05	24-Hour	All	2 <sup>nd</sup>	71.58	3.37	17.51	11.39	Area	54.07
$PM_{10}$	273000	4382500	45.43	24-Hour	All	2 <sup>nd</sup>	67.66	1.89	19.53	4.59	Area	48.13
$PM_{10}$	277000	4385000	45.33	24-Hour	All	2 <sup>nd</sup>	68.11	2.99	18.38	7.39	Area	49.73
PM <sub>10</sub>	276000	4385000	44.36	24-Hour	All	2 <sup>nd</sup>	65.05	2.74	17.51	5.92	Area	47.54
$PM_{10}$	272500	4382000	44.27	24-Hour	All	2 <sup>nd</sup>	71.76	0.98	26.98	1.48	Area	44.78
$PM_{10}$	278500	4385000	43.87	24-Hour	All	2 <sup>nd</sup>	73.22	3.68	12.13	20.90	Area	61.09
$PM_{10}$	273500	4382500	43.43	24-Hour	All	2 <sup>nd</sup>	70.54	1.18	21.03	7.26	Area	49.51
$PM_{10}$	272500	4382500	42.84	24-Hour	All	2 <sup>nd</sup>	66.47	1.95	19.02	6.56	Area	47.45
$PM_{10}$	283500	4385500	41.94	24-Hour	All	2 <sup>nd</sup>	76.59	2.11	36.55	0.21	Area	40.04
PM <sub>10</sub>	276500	4385000	41.72	24-Hour	All	2 <sup>nd</sup>	67.29	3.35	17.85	11.07	Area	49.44
PM <sub>10</sub>	272000	4370500	41.66	24-Hour	All	2 <sup>nd</sup>	34.35	35.29	26.27	1.71	Point	33.59
PM <sub>10</sub>	275000	4382500	41.64	24-Hour	All	2 <sup>nd</sup>	70.33	1.27	28.43	1.52	Area	41.90
PM <sub>10</sub>	274000	4384000	41.05	24-Hour	All	2 <sup>nd</sup>	60.45	1.91	19.28	2.03	Area	41.18
PM <sub>10</sub>	283000	4386000	40.96	24-Hour	All	2 <sup>nd</sup>	55.61	3.51	17.24	0.92	Area	38.37
$PM_{10}$	273000	4382000	40.74	24-Hour	All	2 <sup>nd</sup>	73.63	1.13	20.88	13.15	Area	52.75
PM <sub>10</sub>	282000	4385500	40.48	24-Hour	All	2 <sup>nd</sup>	69.14	3.94	12.95	19.65	Area	56.19

TABLE 4-4 (Continued)
FACILITY CONTRIBUTIONS TO THE PSD INCREMENT CONSUMPTION IN HA83 FOR 2000

Pollutant	UTM East (meters)	UTM North (meters)	Modeled PSD Increment Consumption (μg/m³)	Averaging Period	Source Group	Rank	Current Area Sources (µg/m³)	Current Point Sources (µg/m³)	Baseline Area Sources (µg/m³)	Baseline Point Sources (µg/m³)	Primary Contributor	Primary Contribution (µg/m³)
PM <sub>10</sub>	274500	4384000	40.15	24-Hour	All	$2^{\text{nd}}$	61.77	3.23	21.51	3.34	Area	40.26
$PM_{10}$	275500	4384000	39.79	24-Hour	All	2 <sup>nd</sup>	62.85	2.50	22.85	2.71	Area	40.01
$PM_{10}$	274000	4382500	39.60	24-Hour	All	2 <sup>nd</sup>	70.74	1.40	21.47	11.08	Area	49.28
$PM_{10}$	275500	4385500	39.53	24-Hour	All	2 <sup>nd</sup>	55.91	1.84	16.48	1.74	Area	39.42
$PM_{10}$	275000	4384000	39.46	24-Hour	All	2 <sup>nd</sup>	62.03	3.43	22.50	3.50	Area	39.53
$PM_{10}$	273000	4371000	39.35	24-Hour	All	2 <sup>nd</sup>	16.87	51.09	26.34	2.28	Point	48.82
$PM_{10}$	283000	4385500	39.29	24-Hour	All	2 <sup>nd</sup>	61.62	13.66	6.46	29.54	Area	55.16
$PM_{10}$	273500	4382000	39.01	24-Hour	All	2 <sup>nd</sup>	71.74	0.95	32.10	1.58	Area	39.64
$PM_{10}$	275000	4385500	39.00	24-Hour	All	2 <sup>nd</sup>	54.51	1.71	15.65	1.57	Area	38.86
$PM_{10}$	276000	4384000	38.87	24-Hour	All	2 <sup>nd</sup>	62.44	2.29	23.53	2.33	Area	38.91
$PM_{10}$	278500	4384500	38.73	24-Hour	All	2 <sup>nd</sup>	69.31	4.59	17.54	17.63	Area	51.78
PM <sub>10</sub>	271500	4370500	38.62	24-Hour	All	2 <sup>nd</sup>	48.26	17.40	26.05	0.99	Area	22.22
$PM_{10}$	279000	4385000	38.36	24-Hour	All	2 <sup>nd</sup>	74.31	3.08	12.72	26.31	Area	61.59
$PM_{10}$	271000	4370000	38.09	24-Hour	All	2 <sup>nd</sup>	47.38	15.57	23.65	1.21	Area	23.73
$PM_{10}$	272500	4370500	37.78	24-Hour	All	2 <sup>nd</sup>	45.22	19.20	25.45	1.20	Area	19.77
$PM_{10}$	276500	4384000	37.32	24-Hour	All	2 <sup>nd</sup>	61.75	2.49	24.69	2.23	Area	37.06
$PM_{10}$	283500	4386000	37.11	24-Hour	All	2 <sup>nd</sup>	56.52	3.36	22.65	0.11	Area	33.87
PM <sub>10</sub>	272000	4371000	36.31	24-Hour	All	2 <sup>nd</sup>	47.92	16.09	26.42	1.28	Area	21.50
$PM_{10}$	272000	4370000	36.27	24-Hour	All	2 <sup>nd</sup>	45.24	16.99	23.63	2.33	Area	21.61
PM <sub>10</sub>	282500	4386000	36.22	24-Hour	All	2 <sup>nd</sup>	55.76	3.45	21.59	1.39	Area	34.17
$PM_{10}$	274000	4382000	36.10 <sup>B</sup>	24-Hour	All	2 <sup>nd</sup>	71.68	1.05	34.91	1.72	Area	36.77
PM <sub>10</sub>	279500	4384500	35.74	24-Hour	All	2 <sup>nd</sup>	76.95	4.28	33.12	12.37	Area	43.83
PM <sub>10</sub>	274000	4371500	35.70 <sup>B</sup>	24-Hour	All	2 <sup>nd</sup>	68.76	4.90	12.62	25.34	Area	56.14
PM <sub>10</sub>	282000	4385000	35.69	24-Hour	All	2 <sup>nd</sup>	33.33	30.06	26.59	1.10	Point	28.96
PM <sub>10</sub>	276000	4382500	35.65	24-Hour	All	2 <sup>nd</sup>	69.46	1.69	33.83	1.67	Area	35.63
PM <sub>10</sub>	271500	4370000	35.49	24-Hour	All	2 <sup>nd</sup>	71.71	5.32	14.20	27.34	Area	57.51
PM <sub>10</sub>	281000	4385500	35.45	24-Hour	All	2 <sup>nd</sup>	46.55	15.56	24.61	2.06	Area	21.94
PM <sub>10</sub>	284500	4385500	35.37	24-Hour	All	2 <sup>nd</sup>	60.10	3.25	17.66	10.32	Area	42.43
PM <sub>10</sub>	276500	4385500	35.34	24-Hour	All	2 <sup>nd</sup>	78.25	2.28	44.18	1.01	Area	34.08
PM <sub>10</sub>	277000	4384000	35.32	24-Hour	All	2 <sup>nd</sup>	61.28	2.67	26.23	2.40	Area	35.05

TABLE 4-4 (Continued)
FACILITY CONTRIBUTIONS TO THE PSD INCREMENT CONSUMPTION IN HA83 FOR 2000

Pollutant	UTM East (meters)	UTM North (meters)	Modeled PSD Increment Consumption (µg/m³)	Averaging Period	Source Group	Rank	Current Area Sources (µg/m³)	Current Point Sources (µg/m³)	Baseline Area Sources (µg/m³)	Baseline Point Sources (µg/m³)	Primary Contributor	Primary Contribution (µg/m³)
$PM_{10}$	277500	4384000	35.09	24-Hour	All	2 <sup>nd</sup>	63.29	2.71	28.19	2.72	Area	35.10
$PM_{10}$	273500	4370500	34.96	24-Hour	All	2 <sup>nd</sup>	32.12	29.12	25.02	1.27	Point	27.85
$PM_{10}$	278500	4385500	34.84	24-Hour	All	2 <sup>nd</sup>	65.13	2.37	12.50	20.16	Area	52.63
$PM_{10}$	276000	4385500	34.72	24-Hour	All	2 <sup>nd</sup>	58.65	3.15	17.23	9.85	Area	41.42
$PM_{10}$	283500	4385000	34.66	24-Hour	All	2 <sup>nd</sup>	79.79	7.89	44.86	8.16	Area	34.93
$PM_{10}$	274500	4382500	34.52	24-Hour	All	2 <sup>nd</sup>	71.30	1.72	21.33	17.17	Area	49.97
$PM_{10}$	273500	4383500	34.48	24-Hour	All	2 <sup>nd</sup>	59.62	1.70	24.80	2.04	Area	34.82
$PM_{10}$	275000	4383000	34.28	24-Hour	All	2 <sup>nd</sup>	64.56	1.63	22.08	9.82	Area	42.48
$PM_{10}$	275500	4382500	34.17	24-Hour	All	2 <sup>nd</sup>	70.53	1.76	21.41	16.71	Area	49.12
$PM_{10}$	271000	4369500	33.99	24-Hour	All	2 <sup>nd</sup>	46.07	12.56	23.02	1.62	Area	23.06
$PM_{10}$	271000	4369000	33.93	24-Hour	All	2 <sup>nd</sup>	44.58	12.39	21.46	1.59	Area	23.12
$PM_{10}$	275500	4383000	33.83	24-Hour	All	2 <sup>nd</sup>	64.13	1.58	22.02	9.85	Area	42.11
$PM_{10}$	269500	4369000	33.70	24-Hour	All	2 <sup>nd</sup>	50.60	10.54	26.80	0.64	Area	23.80
$PM_{10}$	271500	4369500	33.56	24-Hour	All	2 <sup>nd</sup>	45.74	14.59	23.69	3.09	Area	22.06
$PM_{10}$	271000	4370500	33.37	24-Hour	All	2 <sup>nd</sup>	48.82	10.74	24.77	1.42	Area	24.04
$PM_{10}$	271500	4381500	33.27	24-Hour	All	2 <sup>nd</sup>	66.78	0.66	32.99	1.19	Area	33.80
$PM_{10}$	277000	4385500	33.23	24-Hour	All	2 <sup>nd</sup>	62.02	4.40	17.48	15.71	Area	44.54
$PM_{10}$	284000	4385500	32.66	24-Hour	All	2 <sup>nd</sup>	68.85	11.00	18.87	28.32	Area	49.98
$PM_{10}$	284000	4386000	32.61	24-Hour	All	2 <sup>nd</sup>	55.50	8.28	31.01	0.16	Area	24.48
$PM_{10}$	274000	4383500	32.48	24-Hour	All	2 <sup>nd</sup>	59.32	1.88	26.24	2.48	Area	33.08
$PM_{10}$	282000	4386000	32.46	24-Hour	All	2 <sup>nd</sup>	56.47	3.66	9.12	18.55	Area	47.35
$PM_{10}$	270500	4369000	32.29	24-Hour	All	2 <sup>nd</sup>	46.69	10.43	23.42	1.41	Area	23.27
$PM_{10}$	283500	4386500	32.20	24-Hour	All	2 <sup>nd</sup>	44.28	6.32	17.35	1.06	Area	26.93
PM <sub>10</sub>	270500	4369500	32.16	24-Hour	All	2 <sup>nd</sup>	50.74	7.44	25.44	0.58	Area	25.30
PM <sub>10</sub>	272500	4370000	32.16	24-Hour	All	2 <sup>nd</sup>	48.77	13.04	29.65	0.00	Area	19.12
PM <sub>10</sub>	281500	4385500	32.05	24-Hour	All	2 <sup>nd</sup>	70.14	4.69	13.54	29.25	Area	56.60
PM <sub>10</sub>	269000	4369000	31.97	24-Hour	All	2 <sup>nd</sup>	51.33	8.34	26.91	0.79	Area	24.42
PM <sub>10</sub>	275500	4373000	31.69	24-Hour	All	2 <sup>nd</sup>	34.64	48.82	29.67	22.10	Point	26.72
PM <sub>10</sub>	273000	4370000	31.61	24-Hour	All	2 <sup>nd</sup>	32.46	24.70	24.86	0.70	Point	24.00
PM <sub>10</sub>	272000	4372500	31.50	24-Hour	All	2 <sup>nd</sup>	16.89	43.29	26.76	1.92	Point	41.38

TABLE 4-4 (Continued)
FACILITY CONTRIBUTIONS TO THE PSD INCREMENT CONSUMPTION IN HA83 FOR 2000

Pollutant	UTM East (meters)	UTM North (meters)	Modeled PSD Increment Consumption (μg/m³)	Averaging Period	Source Group	Rank	Current Area Sources (µg/m³)	Current Point Sources (µg/m³)	Baseline Area Sources (µg/m³)	Baseline Point Sources (µg/m³)	Primary Contributor	Primary Contribution (μg/m³)
$PM_{10}$	272000	4369500	31.32	24-Hour	All	2 <sup>nd</sup>	49.11	7.04	24.11	0.71	Area	24.99
$PM_{10}$	278500	4384000	31.30	24-Hour	All	2 <sup>nd</sup>	66.65	2.89	2.02	36.21	Area	64.63
$PM_{10}$	284000	4386500	31.27	24-Hour	All	2 <sup>nd</sup>	45.18	6.04	19.86	0.08	Area	25.32
$PM_{10}$	272500	4371500	31.20	24-Hour	All	2 <sup>nd</sup>	48.68	10.85	27.31	1.01	Area	21.37
$PM_{10}$	278000	4385500	31.01	24-Hour	All	2 <sup>nd</sup>	51.52	7.47	25.47	2.51	Area	26.05
$PM_{10}$	273000	4370500	31.01	24-Hour	All	2 <sup>nd</sup>	64.97	5.37	12.37	26.96	Area	52.60
$PM_{10}$	276500	4382500	30.96	24-Hour	All	2 <sup>nd</sup>	68.41	1.12	36.76	1.81	Area	31.64
$PM_{10}$	280500	4385500	30.92	24-Hour	All	2 <sup>nd</sup>	71.13	1.86	9.90	32.17	Area	61.23
$PM_{10}$	274500	4383500	30.82	24-Hour	All	2 <sup>nd</sup>	63.34	1.83	22.56	11.79	Area	40.78
$PM_{10}$	273500	4383000	30.81	24-Hour	All	2 <sup>nd</sup>	59.40	1.95	27.75	2.79	Area	31.66
$PM_{10}$	273500	4371000	30.68	24-Hour	All	2 <sup>nd</sup>	52.21	6.66	25.70	2.49	Area	26.51
$PM_{10}$	270000	4369500	30.63	24-Hour	All	2 <sup>nd</sup>	49.86	11.63	29.92	0.95	Area	19.95
$PM_{10}$	274500	4372000	$30.55^{B}$	24-Hour	All	2 <sup>nd</sup>	47.85	13.89	29.33	1.87	Area	18.52
$PM_{10}$	276000	4383500	30.52	24-Hour	All	2 <sup>nd</sup>	63.12	2.06	31.64	3.02	Area	31.48
$PM_{10}$	270500	4370000	30.36	24-Hour	All	2 <sup>nd</sup>	50.09	11.56	30.12	1.17	Area	19.97
$PM_{10}$	284249.9	4385000	30.29	24-Hour	All	2 <sup>nd</sup>	86.35	4.33	59.60	0.80	Area	26.76
$PM_{10}$	277500	4385500	30.27	24-Hour	All	2 <sup>nd</sup>	63.68	6.59	17.15	22.86	Area	46.54
$PM_{10}$	269500	4369500	30.16	24-Hour	All	2 <sup>nd</sup>	49.42	7.93	26.43	0.76	Area	22.99
PM <sub>10</sub>	271500	4371000	30.16	24-Hour	All	2 <sup>nd</sup>	46.46	6.40	22.22	0.49	Area	24.25
PM <sub>10</sub>	272000	4381500	30.14	24-Hour	All	2 <sup>nd</sup>	51.85	8.45	30.17	0.00	Area	21.69
PM <sub>10</sub>	271500	4369000	30.13	24-Hour	All	2 <sup>nd</sup>	66.63	0.68	35.69	1.48	Area	30.94
PM <sub>10</sub>	275500	4383500	30.07	24-Hour	All	2 <sup>nd</sup>	61.42	2.31	30.51	3.16	Area	30.91

A Value modeled at a receptor inside Kal Kan fenceline

<sup>&</sup>lt;sup>B</sup> Value modeled at a receptor inside All-Lite fenceline

TABLE 4-5
COMPARITIVE ANALYSIS FOR MODELED ANNUAL NO<sub>2</sub> PSD INCREMENT CONSUMPTION USING 100% AND 60% AREA SOURCE EMISSIONS AND 2000 METEOROLOGICAL DATA

X-Location	Y-Location	Modeled PSD Increment Consumption Using 100% Area Source Emissions (µg/m³)	Modeled PSD Increment Consumption Using 60% Area Source Emissions (µg/m³)
283100	4382400	34.08	19.95
287000	4382000	32.40	20.46
283000	4382400	32.35	18.12
283200	4381900	32.33	18.56
283200	4382000	31.88	18.41
283300	4381900	31.61	17.84
283100	4381900	31.49	17.98
283300	4382000	31.08	17.69
283000	4382500	31.07	17.62
283100	4382000	31.01	17.61

# $\underline{PM}_{10}$

 $PM_{10}$  modeling showed compliance with the annual  $PM_{10}$  PSD increments. However, there were isolated areas of predicted exceedences of the 24-hour  $PM_{10}$  PSD increments.

The modeling was completed using existing input data from the increment tracking database, with updated source input for Sierra Pacific's Tracy Generating Station, Kal Kan, Eagle-Picher, Naniwa, All-Lite Aggregates, and Alcoa. These updated data were provided by NDEP. The area source data was also updated by Tetra Tech using an updated threshold value of 6.5E-09 g/s-m². The model results showed two general areas where 24-hour PM<sub>10</sub> PSD increment exceedences were predicted outside facility fencelines in HA83: 1) the area near the All-Lite Aggregate facility and 2) an area north and northeast of the Tracy facility. Although there were updates to the facility and area source inventories, these exceedences were still predicted. Figures 4-8a through 4-10b (Appendix C) present the location and magnitude of PM<sub>10</sub> increment consumption in HA83 for 24-hour and annual averaging periods.

The model results for 2000 meteorological year runs indicate there are 124 receptors where the 24-hour  $PM_{10}$  increment is exceeded; however, not all of these exceedences are in ambient are outside facility fencelines. The predicted highest, second-high exceedence outside any facility's fencelines using 2000 meteorological data is  $58.2 \,\mu\text{g/m}^3$ . There were 27 exceedences predicted using 2001 meteorological data, and the modeled highest, second-high value outside any facility's fencelines was  $51.5 \,\mu\text{g/m}^3$ . Tables 4-4 and 4-6 show a breakdown of the predicted  $PM_{10}$  exceedences for the 2000 and 2001 model years, respectively. This breakdown indicates whether  $PM_{10}$  increment consumption at each receptor location is due to area sources or point sources. Figures 4-9a and 4-9b (Appendix C) show a detailed inset of  $PM_{10}$  impacts in HA83 for 2000 and 2001 24-hour averaging periods.

Norm Possiel of EPA provided an EPA study on *Procedures for Developing Base Year and Future Year Mass and Modeling Inventories for the Heavy-Duty Diesel Rulemaking* (EPA 2000). The study acknowledges that ISCST3 and AERMOD over predict resultant concentrations from ground level fugitive sources. The study applies an adjustment factor of 25% to account for large-scale transport of local PM<sub>10</sub> fugitive emissions. In the NDEP Truckee River Corridor study, 100% of area source emissions were used, and the detected exceedences near Tracy can be attributed to area sources. In a comparative analysis, Tetra Tech modeled with only the EPA recommended 25% of the area source emissions, and under this condition, no exceedences caused by area source emissions are predicted north and northeast of Tracy. Table 4-7 shows the modeling results from studies using 100%, 25% and 0% of the area source emissions. This table serves as a comparative analysis for how the area source inventory is affecting modeled PSD increment consumption in HA83.

TABLE 4-6
FACILITY CONTRIBUTIONS TO THE PSD INCREMENT CONSUMPTION IN HA83 FOR 2001

Pollutant	UTM East (meters)	UTM North (meters)	PSD Increment (µg/m³)	Averaging Period	Source Group	Rank	Current Area Sources (µg/m³)	Current Point Sources (µg/m³)	Baseline Area Sources (µg/m³)	Baseline Point Sources (μg/m³)	Primary Contributor	Primary Contribution (µg/m³)
$PM_{10}$	275000	4373000	122.83 <sup>A</sup>	24-hour	All	2 <sup>nd</sup>	9.55	192.93	3.49	76.16	Point	116.78
$PM_{10}$	268500	4374500	51.51	24-hour	All	2 <sup>nd</sup>	87.28	1.82	36.88	0.72	Area	50.40
PM <sub>10</sub>	268500	4375000	49.14	24-hour	All	2 <sup>nd</sup>	92.45	1.54	43.95	0.91	Area	48.51
$PM_{10}$	269000	4375000	45.75	24-hour	All	2 <sup>nd</sup>	90.98	1.64	45.90	0.97	Area	45.08
$PM_{10}$	269500	4375500	45.33	24-hour	All	2 <sup>nd</sup>	96.17	1.26	50.45	1.66	Area	45.73
PM <sub>10</sub>	269000	4374500	45.07	24-hour	All	2 <sup>nd</sup>	84.65	1.89	39.69	1.77	Area	44.96
$PM_{10}$	269500	4375000	44.25	24-hour	All	2 <sup>nd</sup>	89.55	1.53	42.71	4.12	Area	46.84
$PM_{10}$	269000	4375500	42.95	24-hour	All	2 <sup>nd</sup>	95.07	1.17	50.05	3.24	Area	45.02
PM <sub>10</sub>	270000	4375500	41.03	24-hour	All	2 <sup>nd</sup>	93.37	1.26	51.96	1.64	Area	41.41
PM <sub>10</sub>	273000	4370500	38.90	24-hour	All	2 <sup>nd</sup>	42.54	24.34	25.47	2.51	Point	21.83
$PM_{10}$	273500	4371000	38.65	24-hour	All	2 <sup>nd</sup>	43.29	23.55	25.70	2.49	Point	21.06
PM <sub>10</sub>	272500	4370000	36.93	24-hour	All	2 <sup>nd</sup>	42.18	20.76	25.44	0.58	Point	20.18
PM <sub>10</sub>	270000	4375000	35.93	24-hour	All	2 <sup>nd</sup>	84.43	1.47	48.07	1.90	Area	36.36
PM <sub>10</sub>	268500	4375500	35.85	24-hour	All	2 <sup>nd</sup>	90.00	3.42	54.62	2.95	Area	35.38
PM <sub>10</sub>	272000	4369500	34.67	24-hour	All	2 <sup>nd</sup>	41.07	18.42	24.11	0.71	Point	17.71
PM <sub>10</sub>	271500	4369000	33.87	24-hour	All	2 <sup>nd</sup>	40.20	16.38	22.22	0.49	Area	17.98
$PM_{10}$	268500	4374000	33.67	24-hour	All	2 <sup>nd</sup>	68.63	5.11	38.75	1.32	Area	29.88
PM <sub>10</sub>	273000	4371500	33.21	24-hour	All	2 <sup>nd</sup>	46.12	17.06	28.27	1.70	Area	17.85
PM <sub>10</sub>	269500	4374500	32.80	24-hour	All	2 <sup>nd</sup>	72.75	7.06	44.87	2.13	Area	27.88
$PM_{10}$	271000	4368500	32.38	24-hour	All	2 <sup>nd</sup>	39.58	14.59	19.64	2.15	Area	19.94
PM <sub>10</sub>	270500	4375500	32.36	24-hour	All	2 <sup>nd</sup>	91.20	1.63	55.46	5.00	Area	35.74
PM <sub>10</sub>	283000	4386000	31.89	24-hour	All	2 <sup>nd</sup>	46.67	3.37	17.24	0.92	Area	29.43
PM <sub>10</sub>	274500	4373000	31.49 <sup>A</sup>	24-hour	All	2 <sup>nd</sup>	6.41	92.73	49.95	17.71	Point	75.03
PM <sub>10</sub>	274500	4372000	30.78 <sup>A</sup>	24-hour	All	2 <sup>nd</sup>	28.41	33.57	29.33	1.87	Point	31.70
PM <sub>10</sub>	274000	4371500	30.74 <sup>A</sup>	24-hour	All	2 <sup>nd</sup>	31.35	27.08	26.59	1.10	Point	25.98
$PM_{10}$	268000	4375500	30.12	24-hour	All	2 <sup>nd</sup>	84.99	4.03	55.73	3.17	Area	29.27
PM <sub>10</sub>	283000	4386500	30.03	24-hour	All	2 <sup>nd</sup>	43.01	2.37	14.60	0.74	Area	28.41

A Value modeled at a receptor inside All-Lite fenceline

TABLE 4-7
COMPARITIVE ANALYSIS FOR MODELED 24-HOUR PM10 PSD INCREMENT
CONSUMPTION USING 100%, 25%, AND 0% AREA SOURCE EMISSIONS
AND 2000 METEOROLOGICAL DATA

X-Location	Y-Location	Modeled PSD Increment Consumption Using 100% Area Source Emissions (µg/m³)	Modeled PSD Increment Consumption Using 25% Area Source Emissions (µg/m³)	Modeled PSD Increment Consumption Using 0% Area Source Emissions (µg/m³)
280000	4385000	58.27	11.52	5.67
280500	4385000	57.35	14.11	4.35
279500	4385000	56.76	12.12	-0.95
274500	4372500	52.85	30.17	21.27
282500	4385500	51.78	5.64	-5.86
277500	4385000	51.01	12.45	1.50
280000	4385500	50.45	5.86	-5.17
277000	4384500	50.00	11.65	0.45
277500	4384500	49.82	10.05	-1.77
276500	4384500	49.65	11.51	2.30

### 4.6.3 HA85

 $SO_2$  increment consumption was modeled for HA85 using the protocol described in Section 4.2 through Section 4.5. No exceedences in HA85 of the 3-hour, 24-hour, or annual  $SO_2$  increment thresholds were predicted. The distribution of 3-hour, 24-hour and annual  $SO_2$  impacts in HA85 are presented in Figures 4-11a, 4-11b, 4-12a, 4-12b, 4-13a, and 4-13b (Appendix C). Table 4-8 presents the highest second-high predicted impacts for modeling with the 2000 and the 2001 meteorological data for HA 85.

The increment consumption in this area is primarily due to changes in population and traffic since the baseline year of 1996. Also seen from the figures, vast areas of HA85 have increment expansion. This is mostly due to reductions in  $SO_2$  emissions from vehicles, and Sierra Pacific's reduced  $SO_2$  emissions from their boilers.

**TABLE 4-8** HA85 SO<sub>2</sub> PSD INCREMENT CONSUMPTION

Averaging Period	$\begin{array}{c} \textbf{2000 Modeled} \\ \textbf{SO}_2 \textbf{Increment} \\ \textbf{Consumption} \\ (\mu \textbf{g/m}^3) \end{array}$	$\begin{array}{c} \textbf{2001 Modeled} \\ \textbf{SO}_2 \textbf{Increment} \\ \textbf{Consumption} \\ (\mu \textbf{g/m}^3) \end{array}$	SO <sub>2</sub> Increment Limit (μg/m³)	
3-Hour <sup>1</sup>	8.953	9.682	512	
24-Hour <sup>1</sup>	2.049	3.023	91	
Annual <sup>2</sup>	-0.008	-0.016	20	

High Second-High Maximum

# 4.7 SUMMARY AND CONCLUSIONS

This study has presented a PSD increment consumption analysis for 3 planning areas in Western Nevada, HA76, HA83, and HA85. The modeling of impacts described in this study predicted compliance with 3-hour, 24-hour, and annual SO<sub>2</sub> PSD increments in HA76, HA83, and HA85 and compliance with annual PM<sub>10</sub> PSD increments in HA83. The study predicted exceedences of the annual NO<sub>2</sub> increments and 24-hour PM<sub>10</sub> increments in HA83. Tables 4-5 and 4-6 present a summary of the predicted 24-hour PM<sub>10</sub> exceedences in HA83. Fugitive area sources significantly contribute to the predicted NO<sub>2</sub> exceedences in HA83. The highest predicted 24-hour PM<sub>10</sub> exceedences in HA83 were due to impacts from All-Lite Aggregates. Significant refinement of point source input in HA83 was performed in this analysis. Further refinement of the point source database for increment consuming PM<sub>10</sub> emissions in HA83 may further affect the predicted exceedences of PSD increments in HA83.